

EXHIBIT 1

PROPOSED PROTECTIVE ORDER

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G, H,
MARY DOE and MARY ROE, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

GRETCHEN WHITMER, Governor of the
State of Michigan, and COL. JOSEPH
GASPER, Director of the Michigan State
Police, in their official capacities,

Defendants.

No.

Hon.

PROTECTIVE ORDER

In order to protect the interests of Plaintiffs in this action, IT IS ORDERED:

1. All documents filed with the Court which contain the names of Plaintiffs or information which identifies Plaintiffs, their family members, or their employers, directly or indirectly, shall be filed under seal. In all publicly-filed documents, Plaintiffs shall be identified only by their pseudonyms.
2. Plaintiffs' counsel shall disclose the names of Plaintiffs to counsel for Defendants promptly upon request.

3. Counsel for Defendants may disclose the identities of Plaintiffs, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs, to named Defendants, employees of Defendants, and experts retained in this case, but only to the minimum extent necessary to litigate this action or to enforce orders issued by this Court.

4. Individuals to whom Defendants disclose Plaintiffs' identities, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs shall not further disclose that information to any other person without first obtaining confirmation from Defendants' counsel that such disclosure is necessary to litigate this action or to enforce orders of this Court.

5. Any person to whom Defendants disclose Plaintiffs' identities, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs as a result of this litigation shall first read this protective order prior to having access to the identities of Plaintiffs. Counsel for Defendants shall ensure that all persons to whom disclosure is made pursuant to paragraphs 3 and 4 are aware that they are bound by this protective order, and may not disclose the Plaintiffs' identities, the identities of Plaintiffs' family members or employers, or other information that identifies Plaintiffs except as specified herein.

6. Under no circumstances shall any person disclose the names of Plaintiffs, Plaintiffs' family members, or Plaintiffs' employers to the media without the consent of counsel for Plaintiffs.

7. If any specific issues related to non-disclosure of Plaintiffs' identities arise during the course of litigation, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

SO ORDERED.

Hon. _____
U.S. District Judge

Dated: February __, 2022